

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS**

KELLY BLAND, individually and on  
behalf of all others similarly situated,

Plaintiff,

v.

OUR WORLD ENERGY LLC  
AND  
EDJ ENTERPRISES INC.

Defendants.

Case No. 4:24-cv-00994-P

**JURY TRIAL DEMANDED**

**OPPOSITION TO EDJ ENTERPRISES INC.'S MOTION TO DISMISS**

Plaintiff Kelly Bland files this opposition to the April 22, 2025 Motion to Dismiss filed *pro se* by Defendant EDJ Enterprises. (ECF No. 35.) Corporations are not natural people, cannot represent themselves, and thus must be represented by licensed attorneys in federal court. *Memon v. Allied Domecq QSR*, 385 F.3d 871, 873 (5th Cir. 2004). It is black letter law that a corporation cannot represent itself and must be represented by counsel. *Palazzo v. Gulf Oil Corp.*, 764 F.2d 1381, 1385-1386 (11th Cir. 1985). Fictional legal persons like corporations may appear in court only through licensed legal counsel. *Shine TV Ltd. v. MasterChef LLC*, No. 3:24-CV-963-B-BN, 2024 WL 4229458 (N.D. Tex. Aug. 21, 2024), *report and recommendation adopted*, No. 3:24-CV963-B, 2024 WL 4229300 (N.D. Tex. Sept. 18, 2024). As such, EDJ Enterprises Inc.'s motion to dismiss must be denied as a legal nullity and Mr. DeJohn's signature stricken therefrom.

However, through separate motion, EDJ Enterprises Inc. has also requested alternative relief seeking an extension of time to respond to the complaint, presumably through counsel, until April 29, 2025. (ECF No. 36.) The Court has already granted that motion *sua sponte*. (ECF

No. 37.) Therefore, to the extent that Defendant will shortly enter an appearance of local counsel satisfying the requirements of Local Rule 83.10(a), or seek appropriate relief otherwise, Plaintiff *does not* oppose that relief.

RESPECTFULLY SUBMITTED AND DATED April 27, 2025

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**CERTIFICATE OF SERVICE**

I hereby certify that on April 27, 2025, a copy of the foregoing was served electronically on counsel for the Defendants via the ECF system, which will send a copy to all counsel of record.

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